

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

EASTERN DIVISION

No. 05-10849RGS

DOROTHY STANLEY, EXECUTRIX OF THE
ESTATE OF HELEN A. RUNGE,

Plaintiff

v.

WALTER J. KELLY,
KERRY L. BLOOMINGDALE, M.D., and
SUNBRIDGE NURSING AND
REHABILITATION CENTER,

Defendants

**MOTION IN LIMINE TO PRECLUDE THE TESTIMONY OF ARNOLD
ROSENFELD, ESQ. AND MOTION TO DISMISS
FOR LACK OF EXPERT TESTIMONY**

NOW COMES the Defendant, Walter J. Kelly, and moves this honorable Court to preclude the purported expert testimony of Arnold Rosenfeld, Esq. and to dismiss all claims against Defendant Kelly. In support of this motion, the Defendant states that the expected expert testimony is insufficient as a matter of law. In further support, Defendant submits the accompanying Memorandum of Law.

WHEREFORE, Defendant respectfully requests that this Honorable Court preclude Arnold Rosenfeld from testifying at trial of this matter and dismiss all claims against Defendant Kelly.

Respectfully submitted,

The Defendant, Walter J. Kelly,

By his attorneys,

s/ Michele Carlucci

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CERTIFICATE OF SERVICE

I, Michele Carlucci, certify that on January 18, 2008 I have served a copy of the foregoing by electronic filing.

/s/ Michele Carlucci

Michele Carlucci